

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT**

**IN THE MATTER OF:**  
NA'EEM TAMIR MCCOY

CHAPTER 13  
CASE NO. 22-42902-MAR  
JUDGE MARK A RANDON

Debtor \_\_\_\_\_ /

**TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN**

**Now Comes** the Chapter 13 Trustee, KRISPEN S. CARROLL, and files her objections pursuant to E.D. Mich. LBR 3015-3(a) and opposes confirmation of the Chapter 13 Plan where it does not comply with Bankruptcy Code provisions, 11 U.S.C. §§ 1325, 1322, other applicable provisions of Title 11 Chapter 13 and Local Bankruptcy Rules, as follows:

1. Trustee objects to debtor counsel's failure to file a Proof of Service pursuant to E. D. Mich. LBR 1009-1(b) indicating their compliance with E. D. Mich. LBR 1009-1(d) as well as E. D. Mich. LBR 1007-1(d) (serving original Plan on added creditor, Bradford Mallory).
2. Trustee requests that debtor clarify in any Order Confirming Plan that the residential lease creditor is Bradford Mallory per the Amended Schedule G.
3. Trustee requests that debtor amend Schedule B to disclose the post-petition purchase of a 2020 Nissan Versa pursuant to the Order entered on 6/14/2022.

**Wherefore,** the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan and for other and further relief as the Court deems appropriate, including dismissal.

Dated: July 20, 2022

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT  
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ KRISPEN S. CARROLL-mcs

Krispen S. Carroll (P49817)

Margaret Conti Schmidt (P42945)

Maria Gotsis (P67107)

719 Griswold Street, Ste 1100

Detroit, MI 48226

(313) 962-5035

notice@det13ksc.com

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**CERTIFICATE OF MAILING**

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

ACCLAIM LEGAL SERVICES  
8900 E 13 MILE RD  
WARREN, MI 48093

July 20, 2022

/s/ Shannon Horton

SHANNON HORTON

For the Office of the Chapter 13 Trustee-Detroit  
719 Griswold Street, Ste 1100  
Detroit, MI 48226  
(313) 962-5035  
notice@det13ksc.com